

# CENTER FOR APPELLATE LITIGATION

120 WALL STREET – 28<sup>TH</sup> FLOOR, NEW YORK, NY 10005 TEL. (212) 577-2523 FAX 577-2535

ATTORNEY-IN-CHARGE:

ROBERT S. DEAN

ASSISTANT ATTORNEY-IN-CHARGE:

MARK W. ZENO

SENIOR SUPERVISING ATTORNEYS:

CLAUDIA S. TRUSS

BARBARA ZOLOT

MANAGING ATTORNEY:

DAVID J. KLEM

May 6, 2020

RE: *Garlick v. Miller*,  
18-cv-11038-CM-SLC

Hon. Colleen McMahon  
United States District Court Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007

Your Honor:

I represent Petitioner James Garlick in the above referenced case. I write to respectfully request a two-week extension of time to file written objections to Magistrate Cave's Report and Recommendation, dated April 27, 2020, recommending that the habeas petition be denied.

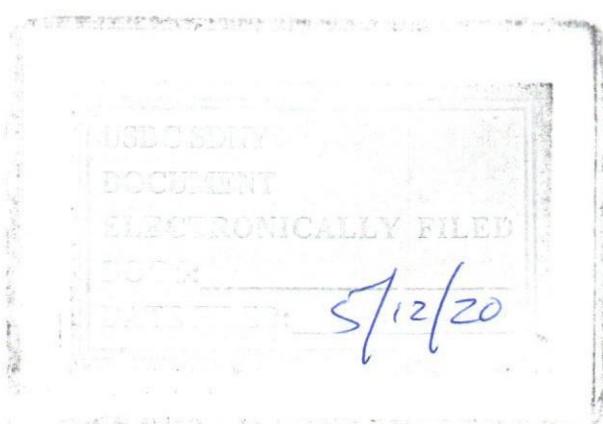
Presently, my objections are due within 14 days of April 27, 2020 (on or before May 11, 2020). No previous request for an extension has been made. I presently have pre-existing obligations which would make it difficult to meet the present May 11th deadline, including emergency litigation in New York State Court seeking the temporary release of several clients who are at risk of serious illness or death if they contract COVID-19. I have consulted with opposing counsel, Robert McKiver and Joshua Weiss of the Bronx District Attorney's Office, and they have consented to my request for an extension.

Wherefore, it is respectfully requested that petitioner's request to file written objections on or before May 25, 2020 be granted.

Sincerely,

*Matthew Bova*

Counsel for Petitioner James Garlick  
(5073135)



SUPERVISING ATTORNEYS:

ROBIN NICHINSKY

ARIELLE I. REID

BEN A. SCHATZ

MOLLY SCHINDLER

KATE SKOLNICK

MARIANNE C. YANG

ASSISTANT MANAGING ATTORNEY:

BRITTANY N. FRANCIS

MATTHEW BOVA

SENIOR APPELLATE COUNSEL:

mbova@cfal.org

212-577-2523 Ext. 543